

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00020-MHL (Consolidated)
Friedman & MacFadyen, P.A. and	:	
Johnie R. Muncy,	:	
Defendants.	:	

JOINT STATUS REPORT CONCERNING MEDIATION PREPARATION

On November 22, 2011 (docket entry 66), the Court entered a stay in these consolidated proceedings to permit the parties to attempt to mediate the pending dispute not just with respect to those claims already the subject of pending lawsuits, but also with respect to similar claims for other clients represented by plaintiffs' counsel. On March 23, 2012 (docket entry 36), the Court extended the stay on the joint motion of the parties. The parties jointly submit this status report pursuant to the Court's November 22, 2011 and March 23, 2012 orders.

1. The initial round of negotiation on these cases took place on May 2, 2012.
2. Plaintiffs' counsel provided Defendants with an outline of settlement terms to be considered, and the parties entered into a tolling agreement to maintain the status quo while negotiations continue.
3. On May 29, 2012, Defendants made a formal written offer now being considered by Plaintiffs and their counsel.
4. The parties may either continue negotiation directly or reconvene before Mag. J. Dennis Dohnal (ret.) in private mediation.

DATED: May 30, 2012

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.
JOHNIE MUNCY**

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of May, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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